

NATALIE K. WIGHT, OSB #035576

United States Attorney

District of Oregon

JUDITH R. HARPER, OSB #903260

Judi.Harper@usdoj.gov

Assistant United States Attorney

310 West Sixth Street

Medford, Oregon 97501

Telephone: (541) 776-3564

Attorneys for the United States

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

UNITED STATES OF AMERICA,

1:23-mc-467

Plaintiff,

v.

\$21,680.00 U.S. CURRENCY, *in rem*,

Defendant.

**UNOPPOSED MOTION TO
EXTEND 90-DAY PERIOD
PURSUANT TO
18 U.S.C. § 983(a)(3)(A)**

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted Matthew Rowan, attorney for claimant Stephen Tazioli, who concurs with this extension.

On March 10, 2023, Stephen Tazioli filed a claim in a non-judicial civil forfeiture proceeding by the Homeland Security Investigations to \$21,680.00 U.S. Currency seized from Stephen Tazioli on or about January 24, 2023.

No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Stephen Tazioli, agree to extend the time in which the United States will file a complaint for forfeiture against the

\$21,680.00 U.S. Currency or to obtain an indictment alleging that the assets are subject to forfeiture. Stephen Tazioli agrees that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended to Thursday, September 7, 2023.

Stephen Tazioli agrees that until the United States files a complaint for forfeiture against the assets and/or obtains an indictment alleging that the assets are subject to forfeiture, or until September 7, 2023, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States and Stephen Tazioli shall not seek its return for any reason in any manner.

DATED: **June 6, 2023**

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ Judith R. Harper
JUDITH R. HARPER
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have made service of the foregoing Motion to Extend 90-Day Period and a proposed Order on the party herein by sending via email on June 6, 2023, to:

Matthew Rowan
mrowan@collinsrowan.com
Attorney for claimant Stephen Tazioli

s/ Dawn Susuico
DAWN SUSUICO
Paralegal